

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. : 25-03918

PROSECUTOR NO. : 095486626

OCN:

**FILED
DIVISION 29**

28-Sep-2025 13:01

CIRCUIT COURT OF JACKSON COUNTY, MO

BY *[Signature]* DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

NATHAN DALE ROSCOE

3111 Ne 59th Ter

Kansas City, MO 64119

DOB: [REDACTED]

Race/Sex: W/M

S.S.N.: [REDACTED]

CASE NO. 2516-CR

DIVISION

DEFENDANT.

**COMPLAINT
WARRANT REQUESTED**

Count I. Assault 1st Degree Or Attempt (565.050-002Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class B felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 27, 2025, in the County of Jackson, State of Missouri, the defendant shot at [REDACTED] head, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], an elderly person and special victim, and was done for the purpose of committing such assault.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo,

committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about September 27, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Assault in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Assault in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Count III. Unlawful Possession Of A Firearm (571.070-004Y20245212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about September 27, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Glock 27 handgun, a firearm, and on March 29, 2021, the defendant was convicted of the felony of Assault in the Second Degree in 29th Circuit Court in Jasper County, Missouri

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

State vs. Nathan Dale Roscoe, Case No.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

MELESA N. JOHNSON

Prosecuting Attorney

Jackson County, Missouri

by,

/s/ Margaret R. Kellstrom

Margaret R. Kellstrom (#77516)

Assistant Prosecuting Attorney

415 East 12th Street

11th Floor

Kansas City, MO 64106

(816) 881-4596

margaret.kellstrom@jacksongov.org

WITNESSES:

The State's witnesses as of 9/28/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.